1	MOI	
2	GABRIEL L. GRASSO, ESQ.	
3	State Bar Number 7358 231 South Third Street, Suite 100	
4	Las Vegas, Nevada 89101 (702) 868-8866	
4	Attorneys for ENE	
5	-	
6	UNITED STAT	ES DISTRICT COURT
7	IN AND FOR THE DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,)
	Plaintiff,)
10	Fiamitin,)
11	vs.	,)
12) MOTION TO MODIFY
	OVIDIU ENE,) CONDITIONS OF PROBATION
13	,	,)
14	Defendant)
15	Defendant.) }
1.6		,
16	MOTION TO MODIFY CONDITIONS OF PROBATION	
17		
18	COMES NOW, OVIDIU ENE, (ENE) through his attorney, GABRIEL L. GRASSO,	
19	ESQ., and respectfully moves this Honorable Court for a Motion to Modify Conditions of	
	his Probation. Specifically, ENE requests that he be allowed to travel within the	
20	continental United States and the country of Panama.	
21		
22		Gabriel L. Grasso, P.C.
		State Bar Number 7358 231 South Third Street, Suite 100
23		Las Vegas, NV 89101
24		(702) 868-8866
25		/s/
		GABRIEL L. GRASSO, Esq.
26		,1
27		

REQUEST

- 1. On December 1, 2014, ENE was sentenced to probation by this Court.
- 2. Part of his conditions of Probation require him to pay restitution in the amount of \$299,000.00
- 3. To date he has paid \$165,000.00 for the restitution amount, but in order to obtain the funds required to complete his restitution payment he will be required to travel to Panama to complete certain business deals. This will also include travel to other states within the U.S. for the same purpose.
- 4. The Government does not object to this request.
- 5. While on Pretrial release ENE traveled to Panama with Court permission and complied with all travel conditions imposed by Pretrial Services.
- 6. All travel requests will be presented to and cleared through his probation officer prior to any travel taking place. All dates of departure and return, with locations visited will also be cleared through Probation.

DATED this 5th day of March, 2015.

Gabriel L. Grasso, P.C. State Bar Number 7358 231 South Third Street, Suite 100 Las Vegas, NV 89101 (702) 868-8866

/s/ GABRIEL L. GRASSO, Esq.

1	GABRIEL L. GRASSO, ESQ. State Bar Number 7358	
2	9525 Hillwood Drive, Suite 190 Las Vegas, Nevada 89134	
3	(702) 868-8866	
4	Attorney for ENE	
5	UNITED STAT	ES DISTRICT COURT
6		
7	IN AND FOR THE DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	
9	Plaintiff,	
10	,	Case No.: 2:11-cr-00444-PMP-PAL
11	VS.) ORDER
12	OVIDIU ENE,	
13	Defendent	
14	Defendant.	
15	<u>ORDER</u>	
16		
17	The defendant will be permitted to travel for business purposes inside the continental	
18	United States, and to the nation of Panama without requesting Court permission. Any	
19	planned travel will require reasonable notice of dates of travel as well as travel	
20	destinations to the Defendant's probation officer. Probation shall permit such travel	
21	unless there is some unique issue regarding said travel which must be presented to this	
22	Court.	
23	2. Upon his return to the District of Nevada from any travel, the defendant will check in	
24	with his probation officer in the manner re	equested by his probation officer.
25	///	
26		
27	<i> </i>	
28	<i>III</i>	

IT IS HEREBY ORDERED that the Defendant can travel inside the continental United States and to the country of Panama for business purposes.

IT IS FURTHER ORDERED that the Defendant shall provide all travel information as well as the address of the place where he will be staying to his probation officer, and while outside the District of Nevada check-in as directed.

IT IS SO ORDERED this 11th day of March, 2015.

Gloria M. Navarro, Chief Judge United States District Court